

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

ROCKET MORTGAGE, LLC, a Michigan
limited liability company,

Defendant.

Case No. 1:22-cv-00346-JL

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26 and Local Rule 26.2, Plaintiff Richard Daschbach (“Plaintiff”) and Defendant Rocket Mortgage, LLC (“Defendant”), by and through their undersigned counsel, hereby move the Court for entry of the proposed and agreed Protective Order governing the confidentiality of material produced during discovery (the “Protective Order”) attached hereto, and in support thereof states as follows:

1. Federal Rule of Civil Procedure 26 authorizes a court to issue protective orders that, *inter alia*, govern the production and disclosure of trade secret or other confidential research, development, or commercial information. *See* Fed. R. Civ. P. 26(c)(1)(G).
2. In accordance therewith, the parties have agreed to entry of the proposed Protective Order.
3. Pursuant to Local Rule 26.2, the parties advise that the proposed Protective Order conforms to Civil Form 5, except as indicated in the redlined copy of the proposed protective order, attached hereto as Exhibit A. The parties propose the following changes: (1) paragraph 4 was included to enable non-parties to designate documents as confidential and thus have such

documents treated the same under the protective order as if so designated by a party; (2) paragraphs 7 & 13 were included to address how inadvertent productions and disclosures should be treated under the order; and (3) paragraph 6(b)(5) was included to permit the disclosure of confidential documents to the authors and recipients of said documents.

4. In accordance with Local Rule 7.1(c), Plaintiff's counsel certifies that he has conferred with counsel for Defendant who has agreed to the proposed Protective Order.

5. No memorandum of law is necessary because this Motion is unopposed, and the relief sought is within the discretion of the Court.

Accordingly, the parties respectfully requests that the Court grant this Motion and enter the proposed agreed Protective Order governing the confidentiality of material produced during discovery.

Date: June 7, 2023

RICHARD DASCHBACH, individually and
on behalf of all others similarly situated,

/s/ Taylor T. Smith

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Counsel for Rocket Mortgage, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2023, a true and correct copy of the above papers was served upon counsel of record by filing such papers via the Court's CM/ECF system.

/s/ Taylor T. Smith